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July 2, 2021

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, Acconeer AB
ET Docket No. 21-264

Dear Ms. Dortch:

On July 1, 2021, Lars Lindell, Mikael Egard, and Kåre Agardh of Acconeer AB ("Acconeer"), and the undersigned, met with the following members of the Office of Engineering and Technology staff: Michael Ha; Jamison Prime; Bahman Badipour; and Steve Jones. Acconeer made the following points and requests for clarification or correction with regard to the draft Notice of Proposed Rulemaking issued in the above-referenced proceeding.[1]

- As a general comment, Acconeer believes that it would be useful for the Commission to state more specifically in the text of the item whether proposals for power level limits (*e.g.*, EIRP, conducted power, and power spectral density limits) are peak or mean/average proposals. That would allow parties to better understand the technical rules that may apply, and provide more useful comments.

- For example, in paragraph 2, second sentence, the summary of the lead proposal references "10 dBm transmitter conducted output power." Because the Commission later references the ETSI EN 305 550 standard from which this proposal is taken, and because the ETSI standard has established the transmitter conducted output power requirement as an *mean* power requirement, Acconeer suggests that inserting the word "means" or "average" after "10 dBm" would be a useful clarification as to what the Commission is proposing.

- In the third sentence of paragraph 10, with regard to references to the ETSI EN 305 550 standard, Acconeer notes that the ETSI standard references *mean* EIRP, while the current FCC Section 15.255 references *peak* EIRP. Therefore, the Commission's conclusion that the EN 305 550 EIRP is "10 dBm greater than the Commission permits under its rules" is not on point, as the statement compares the *mean* ETSI EIRP requirement to the *peak* FCC EIRP requirement. Acconeer suggests that this third sentence could instead read, "Specifically, ETSI Standard EN 305 550 permits operation of short-range devices in the 57-64 GHz band at up to 20 dBm mean EIRP, while Section 15.255(c)(3) presently states that the peak EIRP level shall not exceed 10 dBm."

- Footnote 64 sets out a definition of pulse radar. Acconeer does not believe that the language is entirely accurate, as it does not describe the operations of all pulse radar systems. A more

[1] *See Allowing Expanded Flexibility and Opportunities for Radar Operation in the 57-64 GHz band*, Notice of Proposed Rulemaking (draft), ET Docket No. 21-264 (rel. June 22, 2021).

accurate definition would be: “Pulse radar uses time of flight to measure distance and may in addition utilize the Doppler effect, where movements in range produce a frequency shift on the signal reflected from the target.”

- In paragraph 29, in the third sentence, the Commission states that the peak and average power limits “apply during active transmission (i.e., only over the chirp or pulse duration), the peak and average signals are equivalent.” As Acconeer understands, the ANSI C63 standard, the ETSI procedure, and the common practice by FCC approved test labs is to measure power limits for radar over the course of at least one repetition cycle. The language of the proposed rule (pg. 25) would have the field strength determined “by averaging over one complete pulse train.” Therefore, Acconeer suggests that it would be more accurate if the sentence in paragraph 29 was modified to read “The limits should be measured during active transmission (i.e., over at least one chirp or pulse repetition cycle).” Alternatively, the Commission could invite comments on its conclusion in this sentence by posing it as a question, rather than a statement.

- Regarding paragraph 30, Acconeer believes that if the FCC is to propose a specific duty cycle restriction, it should specifically seek comment on how duty cycle shall be defined for different radar systems operating on different time scales. Modifying the question in this manner could attract more detailed responses from interested parties.

Please direct any questions to the undersigned.

Sincerely,

/s/ Laura A. Stefani
Laura A. Stefani
Counsel to Acconeer AB